



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking Regarding Policies,)
Procedures and Rules for the Low Income Energy)
Efficiency Programs of California's Energy)
Utilities.)

R. 07-01-042
(Filed January 25, 2007)

Southern California Edison Company's (U-338)
E) Application for Approval of SCE's "Change a)
Light, Change the World" Compact Fluorescent)
Lamp Program.)

A.07-05-010
(Filed May 10, 2007)

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338 E) ON THE
PROPOSED DECISION PROVIDING DIRECTION FOR LOW INCOME ENERGY
EFFICIENCY POLICY OBJECTIVES, PROGRAM GOALS, STRATEGIC PLANNING
AND THE 2009-2011 PROGRAM PORTFOLIO AND ADDRESSING RENTER ACCESS
AND ASSEMBLY BILL 2104 IMPLEMENTATION

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Dated: **December 10, 2007**

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AND ASSEMBLY BILL 2104 IMPLEMENTATION**

I.

INTRODUCTION

Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) provides these comments on Commissioner Dian Grueneich and Administrative Law Judge (ALJ) Kim Malcolm's proposed *Decision Providing Direction for Low Income Energy Efficiency Policy Objectives, Program Goals, Strategic Planning and the 2009-2011 Program Portfolio and Addressing Renter Access and Assembly Bill 2104 Implementation*, dated November 19, 2007 (Proposed Decision or PD).

SCE commends the Commission for its efforts in 2007 to stake out a new vision for the Low Income Energy Efficiency (LIEE) program that expands upon the accomplishments that have been achieved through the program to date. The PD supports the Commission's objective of establishing energy efficiency as first priority in the "loading order" for the provision of energy resources in California, while reducing low income customers' bills and improving their quality of life. SCE appreciates that the Commission still maintains its commitment to ensuring that LIEE programs add to the participant's health, safety, and quality of life. SCE also supports the PD's stated Programmatic Initiative "to provide all eligible customers the opportunity to participate in the LIEE programs and to offer those who wish to participate all cost-effective energy efficiency measures in their residences by 2020."¹

However, SCE believes that the PD's discussion of cost-effectiveness requires additional clarification and refinement. SCE agrees with the Commission that workshops will be necessary to provide additional guidance on LIEE cost-effectiveness. SCE also concurs that some measures that may not be cost-effective are essential to address the quality of life of low income customers, and should continue to be available through the LIEE program.

Finally, SCE is committed to working with the Commission and other stakeholders to develop a cost-effective and comprehensive strategy for delivering compact fluorescent lamps (CFLs) to low income customers. While SCE applauds the Commission's focus on developing a long-term plan for achieving cost-effective energy savings by 2020, SCE reminds the Commission that today the premier opportunity to provide immediate bill savings to low income customers is the comprehensive replacement of incandescent lighting with CFLs.

¹ Proposed Decision, p. 4.

II.

DISCUSSION

A. LIEE Program and Measure Cost-Effectiveness

The PD directs the utilities to demonstrate in their 2009-2011 applications that “... all program elements included toward the achievement of the [Programmatic Initiative] ... are cost effective using the total resource test adopted in D.02-08-034.”² The PD also states, however, that the Commission will “continue to authorize funding for measures that serve important social objectives but may not be cost-effective, as long as they serve our primary objective of reducing energy use and promote other values such as participants’ quality of life.”³ SCE seeks the Commission’s clarification on its directives regarding cost-effectiveness. SCE agrees that workshops will be necessary to provide additional guidance on LIEE cost-effectiveness, and understands that cost-effectiveness tests may need refinement in order to better reflect the values of the LIEE program from the standpoint of environmental benefits and societal values.

First, the Commission must recognize that the Energy Efficiency (EE) and LIEE programs do not currently employ the same cost-effectiveness tests.⁴ As acknowledged in the PD, the Total Resource Cost (TRC) test is normally applied to resource programs. In an effort to more closely align the policy goals of the EE and LIEE programs, SCE understands the Commission’s logic in continually referencing the TRC test in the PD. However, while EE programs currently use the TRC test, the LIEE programs use the Utility Cost test and the Modified Participant test as adopted in D. 02-08-034. In D. 02-08-034, the Commission approved “Non-Energy Benefits” (NEB) adders that have been applied to LIEE program and

² Proposed Decision, Ordering Paragraph 3. The PD mistakenly states the Commission adopted the Total Resource Cost (TRC) test in D.02-08-034. The Utility Cost Test and the Modified Participant Test were adopted in D.02-08-034 with incorporation of non-energy benefits.

³ Proposed Decision, pp. 29-30.

⁴ The Commission adopted different criteria for LIEE program cost-effectiveness in D.02-08-034. The Commission is also developing a separate approach for determining cost-effectiveness of the Demand Response programs.

measure cost-effectiveness through both the Utility Cost and Modified Participant tests for selecting measures for the LIEE program. The Utility Cost test and the TRC test provide essentially the same result for the LIEE program, assuming that NEBs are incorporated in both or excluded in both. As the Commission seeks to more closely integrate the LIEE and EE programs, the Commission needs to consider whether a uniform methodology should be developed for assessing cost-effectiveness for these programs, or the degree to which separate methodologies are appropriate.

Second, SCE seeks clarification on the meaning of “program elements” (i.e., the LIEE program as a whole or each measure). To the extent the Commission intends this term to mean each program measure, SCE also seeks clarification on how the utilities are to determine the cost-effectiveness of each program measure. Further, if the Commission requires that “all program elements” be cost-effective according to the same methodology currently used for EE programs (the TRC test without consideration of NEBs), it also needs to recognize that, other than CFLs and perhaps refrigerators, many of the measures currently offered through the LIEE program would not meet cost-effectiveness criteria, and would therefore need to be justified according to other program objectives.

B. Ten Year “Go-Back” Rule

The PD eliminates the Ten Year “Go-Back” rule for LIEE participation.⁵ Under the current LIEE program, homes may generally only receive LIEE services once every 10 years. SCE supports elimination of this restriction. However, the elimination of the Ten Year “Go-Back” rule begs additional questions that will likely require the Commission’s direction in the coming program cycle. For instance, to what extent must the utility go back to a home – expending additional resources – if the home has been treated within the last year, within the last few months? Will there be any time limit on when a house is eligible for new LIEE measures?

⁵ Proposed Decision, p. 56; Ordering Paragraph 3.

If a contractor goes back to a home to install additional measures, how many times is the home counted as “treated?” How will the elimination of the Ten Year “Go-Back” rule impact the pool of eligible customers counted towards the utilities’ achievement of approximately 25% of the Programmatic Initiative by 2011? These questions, and others that are likely to arise as the utilities implement their 2009-2011 programs, will need to be addressed.

C. SCE’s “Change a Light, Change the World” CFL Program

The PD denies SCE’s proposed “Change a Light, Change the World” CFL Program without prejudice.⁶ While SCE is disappointed that it will be unable to implement its CFL campaign in the 2007-2008 timeframe, SCE is committed to working with the Commission and stakeholders to modify the proposal to address concerns and looks forward to submitting a new CFL proposal in connection with the 2009-2011 funding cycle.

SCE does note, however, that CFLs offer an immediate opportunity to reduce bills for low income customers that currently cannot be matched by other measures. While it is appropriate to develop a long-term focus to meet the Commission’s proposed Programmatic Initiative by 2020, SCE believes it is essential to move forward with parallel efforts that can provide immediate bill savings to customers who need them today.

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⁶ Proposed Decision, p. 80.

III.

CONCLUSION

SCE appreciates the opportunity to submit these comments and looks forward to working with the Commission to achieve the Programmatic Initiative as described in the PD.

Respectfully submitted,

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December 10, 2007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338 E) ON THE PROPOSED DECISION PROVIDING DIRECTION FOR LOW INCOME ENERGY EFFICIENCY POLICY OBJECTIVES, PROGRAM GOALS, STRATEGIC PLANNING AND THE 2009-2011 PROGRAM PORTFOLIO AND ADDRESSING RENTER ACCESS AND ASSEMBLY BILL 2104 IMPLEMENTATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **10th day of December, 2007**, at Rosemead, California.

/s/ JENNIFER ALDERETE

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